



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

March 30, 1990



SDMS DocID 587449

Mr. Harish Panchal
Division of Hazardous Waste
Department of Environmental Protection
One Winter Street, Fifth Floor
Boston, MA 02108

Dear Harish:

I have reviewed the Phase I Investigation, Site Inspection report (Draft Screening Site Inspection surrogate) for Texas Instruments, located in Attleborough, MA (MAD007325814). This report was prepared by Wehran Engineering Corp. for the DEP in November of 1985 and submitted to EPA as a MSCA deliverable in March of 1990. My comments are as follows:

Please be sure to include the EPA ID# (in this case MAD007325814) on the cover sheet of all MSCA reports, and on all correspondences with EPA regarding CERCLIS sites.

This report contains references to preliminary HRS scores and HRS documentation which must be removed from the final Screening Site Inspection report (delete the scoring referenced in the Executive Summary page iv, and Section 7).

This report has two fundamental weaknesses. The first is the fact that the information in the report is five years old, and probably out of date. The report must be updated to reflect what is currently known about the site; this should have been done prior to it's much delayed submittal to EPA as a draft deliverable.

I am not implying that the analytical data from 1984 referenced in the report is too old to be included in a 1990 SSI. A well documented release (in Site Assessment terms), can last forever. There is nothing inherently wrong with "old" analytical data simply by virtue of it's being "old". Data usability, rather, is determined by the thoroughness of the QA/QC procedures employed in collecting, analyzing and presenting that data.

Non-analytical information, on the other hand, should be as current and complete as reasonably possible. I understand that in the past Mike Nalipinski has interpreted this to mean that the information in State reports must be no more than two years old. I believe that it is reasonable for EPA to expect MSCA products to be completed in a timely manner (approximately 1-2 years for an SI), and to therefore reflect the current conditions and State knowledge of the subject site.

The second, equally disturbing problem, is the fact that very little information is actually presented in the report. Even the most basic requirements of a Site Inspection report as defined five years ago have not been met. It seems obvious that this report was not prepared with EPA Site Assessment guidelines foremost in mind.

An absolute minimum of factual information has been presented in each section of the report. Still, the reader is left with the impression that much more information is actually available, but was considered unnecessary or inappropriate to include. By way of example, the report mentions that groundwater, surface water, sediment and fish (biota) samples were collected, but the quantitative results are not presented. Similarly, the report states that a groundwater divide transects the site, but offers no technical substantiation for such a conclusion.

I believe that the State is well aware of the type of information required for an SSI and I need not list everything missing from this report. However, some obvious omissions are: a discussion of potential contaminant migration pathways and target populations potentially threatened by the contamination at the site; the number of persons drinking groundwater drawn from wells located within 4 miles of the site, and the locations of those wells; a description of the aquifer from which nearby wells draw water; a description of the surface water pathway, and surface water use (drinking water, recreation, etc.) within 15 miles downstream of the site; an evaluation of whether exposure via direct contact is a threat for persons onsite or living nearby...

Some additional comments for specific sections of the report are:

Section 3 Site History

3.3 Site Disposal History -

Include a thorough discussion of the regulatory history, current status, permits, etc. in this report. The report makes no mention of the site's RCRA status. I know that TI filed as a RCRA TSDF in 1980, but they claim to have been a protective filer (discussed in my 3-29-90 letter regarding Texas Instruments). From the report's meager description of the two sludge lagoons which were closed in 1981, it sounds like maybe they did function as a TSD facility for a period after November 19, 1980. Was the closure in 1981 conducted under RCRA authorities? Because this is a crucial issue for Superfund, more specific information in this regard is needed in order to determine once and for all whether this site is subject to RCRA Corrective Action.

Section 4 Environmental Setting

4.3 Site Hydrology -

What is the nature and cause of the "groundwater divide" which is purported to bisect the site? What evidence supports this theory? Is this Wehran's conclusion, or is it excerpted from another contractor's report?

4.4 Past Sampling and Analysis Programs

Include all sampling information to date in this report. Summarize significant results in a table; include the original data analyses as an appendix. Include (if possible) a site sketch showing sampling locations.

Section 6 Recommendations

Based upon my conversation with Gail Costelas (SERO) two days ago, I assume that the conclusions should be rewritten to state the DEP's belief that this site warrants further Superfund action.

Overall, this report does not adequately fulfill the requirements for a Screening Site Inspection report, and will not be accepted until the above comments have been fully addressed. If you have any questions regarding my comments, I may be reached at 573-9697.

Sincerely,



Nancy Smith
MA Site Assessment Coordinator

cc: Gail Costelas (SERO)